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June 1, 2005

Regulatory Analysis and Development  
PPD, APHIS, Station 3C71  
4700 River Road Unit 118  
Riverdale, MD 20737-1238

Re: National animal identification system  
Docket No. 05-015-1

To Whom It May Concern:

I am an Alpaca breeder of almost 17 years duration and have been using Avid Microchips for identification of my animals for many of those years. All animals currently owned by me are implanted with a 9 digit 125 kHz Encrypted Avid Chip. My Avid reader reads the 125 kHz chips, both 10 digit Euro code and the 9 digit encrypted Avid chip.

The National Animal Identification System Draft document refers to the use of ISO standard 11784 & 11785. The 11784 refers to the 15 digit 134.2 kHz ID number and the 11785 refers to the 10 digit 125 kHz ID number. The 125 kHz 10 digit chips meet the ISO 11785 requirement.

At this time the draft does not mention the Avid 9 digit Encrypted number though the European Union which is further ahead than the U.S. with national animal ID program, have further clarified the acceptance of the Avid encrypted 9 digit number with the requirement that the owner (or their veterinarian) must have their own Avid reader. There are over 3.5 million animals in the U.S. with the Avid ID number that should be grandfathered into the NAIS.

It is my understanding that the National ID issue has come to play because of the cattle industry. They have not traditionally used the same RFID as some of the smaller livestock and have set the guideline of the 15 digit, 134.2 kHz RFID use. It may have to do with exporting and it appears that TI has played a huge role in the direction the cattle industry has gone. Understandably, the company producing 134.2 devices may be lobbying heavily toward all livestock using the 134.2 kHz RFID. According to the ISO standard that is NOT necessary.

The country code 840 is being required for cattle as a food chain animal and we do not belong to that group. Should APHIS require that addition, it will mean that we are paying the cost to comply with a cattle decision. Making this change will create unwarranted costs that will benefit only those that are lobbying for the change (i.e. the company that produces the 134.2 units).

The alpaca industry, as well as other species, has already been using the 125 kHz 9 and 10 digit RFID successfully for many years. There are a huge number of readers already in place that read the 125 kHz chips, both 9 & 10 digits.

The use of 125 kHz chips and the Avid Encrypted 9 digit number meets the ISO 11785 requirement that the alpaca industry is using and should be grandfathered into the system. It has recently been a requirement within our industry for travel and shows.

Thank you for taking the time to consider this most important matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Lona Nelsen Frank', with a stylized, flowing script.

Lona Nelsen Frank